

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:15-CR-148
vs.	:	
	:	
WILLIAM M. APOSTELOS,	:	Judge Thomas Rose
	:	
Defendant.	:	

**MOTION TO MODIFY BOND**

Now comes the Defendant, WILLIAM M. APOSTELOS, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond, to allow Mr. Apostelos to visit private attorney Dwight Brannon's office this Saturday, April 8<sup>th</sup>, from 9:00 a.m. to 12:00 pm to discuss civil legal matters Mr. Apostelos currently has pending.

Assistant United States Attorney Brent Tabacchi objects to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,  
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins  
F. Arthur Mullins (0080483)  
Assistant Federal Public Defender  
Fifth Third Center, Suite 490  
1 South Main Street  
Dayton, Ohio 45402  
(937) 225-7687  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic mail on the date same was filed.

s/F. Arthur Mullins  
F. Arthur Mullins

Attorney for Defendant  
William M. Apostelos